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VIA ECF

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

Re: *Maria Elena Swett Urquieta v. John Francis Bowe*, 1:24-cv-01379-PAE

Dear Judge Engelmayer:

We represent the Respondent, John Bowe, in the above-referenced action. Pursuant to Your Honor's Individual Rules and Practices in Civil Cases and the discussion at the final pretrial conference, Respondent respectfully requests permission to redact portions of his Proposed Findings of Fact and Conclusions of Law that discuss highly personal facts relating to S.B.S. that relate to the grave risk defense, before filing on the public docket.

Although the Proposed Findings of Fact and Conclusions of Law are "judicial documents" to which the presumption of public access applies, *see Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016), there exist countervailing privacy interests here, specifically related to "sensitive personal information" involving children. *See Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015). Furthermore, the child at issue, S.B.S. is a nonparty. Accordingly, we believe the requested redactions are appropriate. *See e.g., Arulpragasam v. Bronfman*, No. 13-CV-2472, 2013 WL 2249256 (E.D.N.Y. 2013) (allowing parties to redact child's information to protect his privacy and safety, but not revise the caption for anonymity). Petitioners join this application.

We are available to discuss this application at the Court's convenience.


Respectfully submitted,

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

/s/ Karen King  
Karen King

GRANTED.

SO ORDERED.

  
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PAUL A. ENGELMAYER  
United States District Judge  
April 9, 2024